

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

THOMSON REUTERS ENTERPRISE)	
CENTRE GMBH and WEST PUBLISHING)	
CORPORATION,)	
)	
Plaintiffs and)	
Counterdefendants,)	
)	
v.)	C.A. No. 20-613 (SB)
)	
ROSS INTELLIGENCE INC.,)	
)	
Defendant and)	
Counterclaimant.)	

**STIPULATION AND [PROPOSED] ORDER TO
TAKE DEPOSITION AFTER CLOSE OF FACT DISCOVERY**

IT IS HEREBY STIPULATED by the parties, subject to the approval of the Court, that the depositions of Andrew Arruda, Charles von Simson, and Mike Dahn in his individual capacity and as a 30(b)(6) representative will be taken on the following dates:

- Charles von Simson – May 17, 2023
- Andrew Arruda – May 19, 2023
- Mike Dahn – May 23, 2023
- West Publishing & Thomson Reuters 30(b)(6) – May 23, 2023

The reason for taking these depositions after the May 11, 2023 close of fact discovery is to accommodate both the witness's and the Parties' availability.

MORRIS, NICHOLS, ARSHT & TUNNELL LLP

/s/ Michael J. Flynn

Jack B. Blumenfeld (#1014)

Michael J. Flynn (#5333)

1201 North Market Street

P.O. Box 1347

Wilmington, DE 19899

(302) 658-9200

jblumenfeld@morrisnichols.com

mflynn@morrisnichols.com

Attorneys for Plaintiffs/Counterdefendants

POTTER ANDERSON & CORROON LLP

/s/ Bindu A. Palapura

David E. Moore (#3983)

Bindu A. Palapura (#5370)

Andrew L. Brown (#6766)

Hercules Plaza, 6th Floor

1313 North Market Street

Wilmington, DE 19801

(302) 984-6000

dmoore@potteranderson.com

bpalapura@potteranderson.com

abrown@potteranderson.com

Attorneys for Defendant/Counterclaimant

IT IS SO ORDERED this ____ day of May, 2023.

UNITED STATES DISTRICT JUDGE

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